

AMENDED Exhibit 102

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT) MDL No.
ADDICTION/PERSONAL INJURY) 4:22-md-3047-YGR
PRODUCTS LIABILITY LITIGATION)

-----)
SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES
SPRING STREET COURTHOUSE

COORDINATION PROCEEDING)
SPECIAL TITLE [RULE 3.400]) Lead Case No.
) 22STCV21355

SOCIAL MEDIA CASES)
-----)

This Document Relates to:)

)
STATE OF TENNESSEE,)
ex rel. JONATHAN SKRMETTI,)
ATTORNEY GENERAL and REPORTER,)
v.)
META PLATFORMS, INC., and)
INSTAGRAM, LLC,)
Case No. 23-1364-IV)
-----)

Friday, March 14, 2025

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Video-Recorded Oral Deposition of
SHILPA MODY, held at the offices of Covington
& Burling LLP, 3000 El Camino Real, 5 Palo
Alto Square, Suite 1000, Palo Alto,
California, commencing at 9:08 a.m. PDT on
the above date, before Debra A. Dibble,
Fellow of the Academy of Professional
Reporters, Certified Court Reporter,
Registered Diplomate Reporter, Certified
Realtime Reporter and California CSR #14345.

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1 A. No. I think this looks pretty
2 accurate.

3 Q. Okay. All right. I'd just
4 like to look at some of your experience and
5 education. I think I'm going to go to your
6 education first.

7 And so if we could turn to the
8 second page of three. Towards the middle of
9 the page, do you see where it says Education?

10 A. Yes.

11 Q. Okay. And so I see there
12 Queen's University, Bachelor of Computing,
13 Cognitive Science, between 2003 and 2007.

14 Does that reflect your
15 undergraduate studies?

16 A. Yes.

17 Q. And Queen's University is a
18 college in Canada; is that correct?

19 A. Yes.

20 Q. Based on your opinion, is
21 Queen's University a prestigious university
22 in Canada?

23 A. Reasonably prestigious, yeah.

24 Q. Okay. And then above that we
25 see Harvard University, Doctor of Philosophy

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1 (PhD), Psychology, between 2010 and 2016.

2 Do you see that?

3 A. Yes.

4 Q. And does this reflect that you
5 obtained your PhD from Harvard in 2016 in
6 psychology?

7 A. I did, yes.

8 Q. Okay. Great. Thank you very
9 much.

10 Okay. If we could turn to the
11 first page, and look at some of your
12 experience.

13 So I'd like to look first at
14 your current position. It says that you are
15 a senior user researcher at Grammarly.

16 Do you see that?

17 A. Yes.

18 Q. And your LinkedIn profile says
19 you've been in this position since
20 March 2022; is that correct?

21 A. Yes, it is.

22 Q. Okay. And then below that we
23 have just a little blurb about your time
24 there. Do you see that sentence that begins
25 with "I do mixed-methods research"?

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1 A. Yep.

2 Q. Okay. It says: I do
3 mixed-methods research, generating insights
4 and working with teams on topics ranging from
5 growth to trust to generative AI.

6 Did I read that correctly?

7 A. Yes.

8 Q. And does that accurately
9 reflect your current role at Grammarly?

10 A. Yeah, it does.

11 Q. Let's look at the next position
12 below that. It says Meta. And then it says
13 you were at Meta for five years and one
14 month.

15 Do you see that?

16 A. Yep.

17 Q. And do you have any reason to
18 dispute that that's how long you worked at
19 Meta?

20 A. I was there for five years,
21 exactly, but, no.

22 Q. Okay.

23 A. Yeah.

24 Q. Okay. And then, let's look at
25 the bottom position here. It says: User

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1 experience researcher - Messenger.

2 Do you see that?

3 A. Yes.

4 Q. And it says you were in this
5 position between March 2017 and
6 September 2018.

7 Did I read that correctly?

8 A. Yes.

9 Q. And beneath that it has a
10 little bit -- some cut off -- I'm only going
11 to read the first sentence. It says: I
12 worked with product teams and leadership
13 across Facebook Messenger on topics ranging
14 from new types of ads to quality and
15 performance, to the apps' market position.

16 Does that accurately and
17 generally describe your role as a user
18 experience researcher for Messenger?

19 A. Yes.

20 Q. Okay. Let's look at the
21 position above that. It says: Senior
22 quantitative user researcher - Instagram.

23 Did I read that correctly?

24 A. Yes.

25 Q. What is quantitative research?

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1 A. In this particular role, what
2 that means is that I focused primarily on
3 doing surveys rather than, like, more
4 qualitative methods like interviews.

5 Q. Okay. Stepping back from this
6 role specifically, are you able to tell me
7 generally what quantitative research is?

8 A. Yeah. I would say, like at
9 tech companies, quantitative research is
10 typically survey work, but at some companies
11 it can also include like looking at
12 behavioral metrics in the way that a data
13 scientist would as well.

14 Q. Okay. Are you familiar with
15 the term "qualitative research"?

16 A. Yes.

17 Q. What is qualitative research?

18 A. Qualitative research is
19 typically research done with smaller samples
20 of people, so like things one-on-one
21 interviews that you can only do with a small
22 set of people.

23 Q. Okay. And are you able to tell
24 me the difference, like what are the
25 differences between qualitative research and

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1 do I understand correctly that survey
2 participants in India and Indonesia were not
3 asked questions in the survey about
4 misinformation topics?

5 A. Yeah.

6 Q. Great. Thank you very much.

7 The third heading on this slide
8 is: What's A Negative Experience, and
9 there's a question mark there.

10 Do you see that?

11 A. Yes.

12 Q. And then it says: We asked
13 people about seeing or experiencing 14
14 different negative experiences, which covered
15 many of the areas that the Well-Being team is
16 working on (e.g., bullying and harassment,
17 nudity and sexual content, inauthentic
18 engagement, misinformation).

19 Did I read that correctly?

20 A. Yes.

21 Q. And so you surveyed 30,000
22 Instagram users about 14 different negative
23 experiences, correct?

24 A. I did, yes.

25 Q. And then beneath that it says:

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1 The language we used in questions did not map
2 onto our classifiers or policies. We were
3 aiming to measure subjectively bad
4 experiences, whether or not they were policy
5 violating. For example, if someone feels
6 they were bullied, even if we wouldn't take
7 down the content, we want to count that
8 experience.

9 Did I read that correctly?

10 A. Yes.

11 Q. And would it be fair to say
12 that this slide reflects some high-level
13 methodology that was used in conducting this
14 survey?

15 A. Yes.

16 Q. Okay. Great. Thank you very
17 much.

18 We can move on to slide four.
19 And at the top it says: What We Did.
20 Correct?

21 A. Yes.

22 Q. And taking a moment to look at
23 this slide, does this slide also provide us
24 some more methodology information about this
25 survey?

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1 BY MR. RICHARDS:

2 Q. And are Likert scales used in
3 quantitative research?

4 A. Very frequently, yes.

5 Q. Okay. Thank you very much.
6 We can move on to slide six in
7 this PowerPoint.

8 Okay. At the top of this
9 slide, do you see where it says Perceived
10 Reach?

11 A. Yes.

12 Q. And we discussed a moment ago
13 that that refers to the percentage of survey
14 respondents who experienced these various
15 issues, correct?

16 MS. BARNHART: Object to the
17 definition.

18 A. To the number of -- the percent
19 of respondents who said that they -- yeah.
20 Who said that they experienced these issues.

21 BY MR. RICHARDS:

22 Q. Okay. Thank you.

23 Beneath that it says: Overall,
24 the perceived reach of negative experiences
25 on Instagram is quite high.

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1 Do you see that?

2 A. Yes.

3 Q. And that text is in blue on
4 this page, correct?

5 A. It is, yes.

6 Q. And the text in this top
7 paragraph, the rest of it is black, correct?

8 A. Yes.

9 Q. As the author of this
10 presentation, were you trying to emphasize
11 that first sentence by altering the color?

12 MS. BARNHART: Object to the
13 form.

14 A. Yes, I was.

15 BY MR. RICHARDS:

16 Q. Thank you.

17 And then after that it says:
18 Over half of respondents reported seeing a
19 suspicious account in the last week. Other
20 problems with high-perceived reach are seeing
21 commercial spam, experiencing inauthentic
22 engagement, and seeing misinformation.

23 Did I read that correctly?

24 A. Yes.

25 Q. I want to look at -- generally,

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1 Q. Could you do the same thing
2 with the body image circle?

3 A. Yep. So the body image circle
4 is quite far over to the right-hand side. So
5 it is, I guess, the second-highest proportion
6 of -- out of all these issues, the issue for
7 the -- the second-highest proportion said
8 that Instagram made that experience worse,
9 and it is kind of middling intensity.

10 Q. Okay. I want to just
11 understand the proportion Instagram made it
12 worse. And I'll use an example, and you tell
13 me if I'm right or wrong.

14 Is it fair to say, reading this
15 chart, that just over -- or around one-third
16 of respondents answered that Instagram made
17 problematic social media use worse?

18 MS. BARNHART: Object to the
19 form.

20 A. Yeah. So this is a -- I'm just
21 noting now that this graph is only looking at
22 teen respondents.

23 BY MR. RICHARDS:

24 Q. Okay. Thank you.

25 A. Yep. But the -- yeah, the way

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1 to read that would be, yeah, around
2 one-third, or just over 30%, of teen
3 respondents who said that they'd experienced
4 problematic social media using the follow-up
5 questions about it said that Instagram made
6 that experience worse.

7 Q. Okay. And I'm going to ask a
8 similar question with respect to body image.
9 That comes just after the .20 part of the
10 X-axis -- yeah, the X-axis. Is it -- am I
11 understanding it correctly that that reflects
12 over 1 in 5 teens reporting Instagram made
13 body image issues worse?

14 MR. MAINLAND: Objection to
15 form.

16 A. Yeah. So similar to the other
17 one, it's saying that of the people who said
18 that they had experienced body image issues
19 in the last 30 days and then received this
20 particular follow-up question about it, just
21 over 1 in 5 of them said that Instagram made
22 that experience worse.

23 BY MR. RICHARDS:

24 Q. Okay. And then you gave me
25 some helpful information about how to

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1 interpret where various -- you know, body
2 image and social media use fall on this
3 chart. Could you please do the same thing
4 with respect to social comparison, towards
5 the middle?

6 A. Yep. So social comparison
7 is -- looks like kind of third-most to the
8 right here, so it is, out of all of these
9 different experiences, if we're trying to
10 rank them by what proportion of teens who had
11 experienced them felt that Instagram had made
12 that experience worse, social comparison
13 looks like it's third on that. And it also
14 looks like middling to high intensity
15 compared to the other experiences.

16 Q. And in terms of proportion or
17 fractions, is this just under 1 in 5 of the
18 survey respondents answering that Instagram
19 made social comparison worse?

20 MS. BARNHART: Object to the
21 form.

22 A. Yeah, it looks like it's
23 around -- somewhere between, you know, 15 and
24 20%.

25 * * *

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1 Q. Who is [REDACTED] [REDACTED]?

2 A. [REDACTED] [REDACTED] was, I believe,
3 either an engineer or engineering manager on
4 the team. I forget now.

5 Q. Okay. And how regularly -- or
6 did you work with [REDACTED] [REDACTED] while you were
7 at Meta?

8 A. Yeah, we did. We worked
9 together.

10 Q. How frequently or infrequently
11 would you say?

12 A. We were on the, like the
13 same -- worked on the same product team. But
14 that being said, engineers and researchers
15 don't always spend a ton of time together.

16 Q. Okay. That's helpful.

17 I want to look at the third
18 chat you send here, where you say: Justin,
19 just -- Justin did a quick look into this,
20 and it turns out that at the high end, we
21 really do recommend a lot of high-NAC content
22 to teens, exclamation point.

23 Did I read that correctly?

24 A. Yes.

25 Q. And did you put "A LOT" in all

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1 caps here?

2 A. I did.

3 Q. And then after that it says:

4 Like for the top 10% of teens, our recs in

5 Explore are 57% high-NAC, and then there's an

6 emoji there. Correct?

7 A. Yes.

8 Q. And so what are you referring

9 to here when you say the top 10% of teens?

10 A. So --

11 MS. BARNHART: Object to the

12 form, foundation.

13 A. Yeah. So if I -- if I remember
14 correctly, what I'm talking about here is if

15 you kind of, you know, kind of graphed, like,

16 all teens and how -- and, you know, what

17 percentage of our recommendations in Explore

18 are -- what I'm calling here high-NAC

19 content, then for the percent of teens for

20 which it's the most, like that top 10%, it is

21 57%.

22 BY MR. RICHARDS:

23 Q. And the NAC here, does that

24 refer to negative appearance comparison?

25 A. Yes.

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1 Q. And so you're saying here that
2 of those top 10% of teens, you know, seeing
3 NAC in Explore, 57% of Instagram's
4 recommendations for content were high-NAC,
5 according to this chat, correct?

6 A. Yeah. So I'm saying for 10% of
7 teens, 57% of the recommendations in Explore
8 are high-NAC. For the other nine -- I guess,
9 just to make sure we understand what that
10 number means, for the other 90% of teens, you
11 know, less than 50% of their recommendations
12 in Explore would be high-NAC.

13 Q. Less than 57%, correct?

14 A. Yes, sorry, 57%, yes.

15 Q. And then I'm going to skip
16 along where you share, perhaps an image or
17 something, and you say below that: In the
18 strategy doc I'm writing, I'm basically
19 saying let's show less high-NAC content but
20 personalize/target it so we're better
21 balancing potential harm and preferences.
22 The three specific ideas are 1, at the top
23 end, put a limit on how much high-NAC content
24 we recommend to teens (e.g., something below
25 57%).

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1 Q. And the 60th percentile for
2 teen girls?

3 A. It looks like 15%.

4 Q. Okay. And if we compare these
5 two charts that we've looked at so far for
6 teens generally and teen girls, do teen girls
7 or teen -- do teen girls have a higher or
8 lower percentage of high-NAC content on
9 Explore than teens generally?

10 A. It looks like teen girls -- at
11 each of these kind of like comparing across
12 these different percentiles, it looks like
13 all of the numbers for teen girls are higher.

14 Except for -- no, yep, it looks
15 like all of them are higher.

16 Q. Okay. Great. Thank you very
17 much.

18 Okay. We can move on to our
19 next document, which for the display is Z10.

20 (Whereupon, Meta-Mody-11,
21 E-mail(s), Subj: Re: [Email review]
22 Mental Well-being: Check feedback and
23 18-month goals for prioritization,
24 META3047MDL-003-00128201 through
25 META3047MDL-003-00128206, was marked

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1 can't, exclamation point. Correct?

2 A. Yes.

3 Q. And then I want to look just
4 two beneath that where Shruti says: Yeah, I
5 am not sure how else you would measure
6 well-being.

7 Did I read that correctly?

8 A. Yes.

9 Q. And is that in reference to
10 people's perception is literally ground truth
11 because we're asking about personal
12 experiences/feelings?

13 Is that your understanding?

14 A. That is my understanding, yes.

15 Q. Okay. Thank you.

16 We can turn to the next page
17 ending in 967.

18 Will you read your -- the first
19 time your name appears on this page at the
20 top? Will you read the chat you provided at
21 15:45:20?

22 A. Yep.

23 Yeah, I am really just trying
24 to understand the reasoning behind this.
25 Like I feel like they're absolutely throwing

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1 us under the bus and making us sound
2 incompetent, which is not great obviously,
3 but would feel better to me if there was a
4 good reason to do it.

5 Q. And then Shruti replies: If
6 they focus on flaws in the research as
7 opposed to the public critique, which is
8 about flaws in leadership, they come across
9 as defensive.

10 Did I read that correctly?

11 A. Yes.

12 Q. I'm going to skip one, two,
13 three, four, five, six -- about seven
14 lines -- seven chat blocks down, where Shruti
15 says at 15:48:57: I don't know why they are
16 going about it this way. Because he didn't.
17 But they are just disqualifying everything
18 they can in the research in case someone
19 takes some finding and makes a big deal about
20 it. I mean, they are even trying to
21 disqualify the qual work, haha.

22 And qual there, that means
23 qualitative work, correct?

24 A. Yes.

25 Q. And did I read that correctly

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1 so far?

2 A. Yes.

3 Q. Would you read your response to
4 that?

5 A. Yeah. I think they're
6 basically trying to discredit the work so
7 much that it's like it didn't get leaked at
8 all.

9 Q. And then the next quote from
10 you?

11 A. To stop cherry-picking,
12 et cetera.

13 Q. And the next?

14 A. And they are probably also
15 trying to fight this on all fronts.

16 Q. And then Shruti says: Yeah.
17 Do you see that?

18 A. Yep.

19 Q. And then will you read your
20 next two chats?

21 A. Like saying, we didn't really
22 know anything, and also, we didn't fail to
23 act because we did build things, and also, we
24 didn't lie.

25 Q. Right. So that chat, it says

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1 implementing, running, and analyzing it.

2 The survey compared the
3 experiences of teens who were seeing like
4 counts but had the option to opt in to hiding
5 them, with those of teens who had like counts
6 hidden and had the option to opt out of
7 hiding them.

8 We found that teens with like
9 counts hidden as the default (and the option
10 to opt out) were significantly less likely to
11 feel worse about themselves because of the
12 number of likes other people received on
13 their Instagram posts.

14 This research helped develop
15 our understanding of the impact of Daisy
16 controls, and highlighted the potential value
17 of launching it as a default for teens in the
18 future.

19 Q. Isn't it right that you
20 testified earlier that Daisy, to your
21 recollection, did not launch as a default
22 with the option to opt out?

23 A. I'm not sure whether it did or
24 not.

25 Q. Okay. Dr. Mody, what was your

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C E R T I F I C A T E

I, DEBRA A. DIBBLE, RDR, CRR, CRC,
Notary Public, do hereby certify:

That SILPA MODY., the witness
whose deposition is hereinbefore set forth,
was duly sworn by me and that such deposition
is a true record of the testimony given by
such witness;

That pursuant to FRCP Rule 30,
signature of the witness was not requested by
the witness or other party before the
conclusion of the deposition;

I further certify that I am not
related to any of the parties to this action
by blood or marriage, and that I am in no
way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have
hereunto set my hand on this 21st day of
March 2025



Debra A. Dibble

Fellow of the Academy of Professional
Reporters

Registered Diplomate Reporter

Certified Realtime Reporter

Notary Public 11/17/2027

CA 14345